

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUNE E. ADAMS IRREVOCABLE TRUST
DATED 7/21/14 FBO EDWARD ROBERT
ADAMS, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES
CORPORATION, VIRGINIA M. ROMETTY,
MARTIN J. SCHROETER, JAMES J.
KAVANAUGH and ARVIND KRISHNA,

Defendants.

Case No. 7:22-cv-02831-VB

CLASS ACTION

**NOTICE OF MOTION OF BRUCE SCOTLAND, SARAH SCOTLAND, REBECCA
SCOTLAND, PRISCILLA SCOTLAND, AND JESSICA PLOEGER FOR
APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4, as amended by the Private Securities Litigation Reform Act of 1995, lead plaintiff movants Bruce Scotland, Sarah Scotland, Rebecca Scotland, Priscilla Scotland, and Jessica Ploeger (“Movants”) hereby moves this Court, the Honorable Vicent L. Briccetti, United States District Judge, for an Order:

- (a) appointing Movants as Lead Plaintiff; and
- (b) approving Movants’ selection of Bernstein Liebhard LLP as Lead Counsel for the litigation.

This motion is supported by the accompanying Memorandum of Law, the concurrently filed Declaration of Joseph R. Seidman, Jr., the exhibits thereto, the pleadings and other filings in this action, and such other written or oral argument as may be permitted by the Court.

Dated: June 6, 2022

Respectfully submitted,

/s/ Joseph R. Seidman, Jr.
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*Counsel for Movants and Proposed Lead
Counsel for the Proposed Class*

CERTIFICATE OF SERVICE

I, Joseph R. Seidman, Jr., hereby certify that on June 6, 2022, a true and correct copy of the foregoing was served in accordance with the Federal Rules of Civil Procedure with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all parties with an email address of record who have appeared and consented to electronic service in this action.

Dated: June 6, 2022

/s/ Joseph R. Seidman, Jr.
Joseph R, Seidman, Jr.